1	WILLIAM H. BROWN, ESQ. (7623)		
2	BROWN MISHLER, PLLC 911 N. Buffalo Dr., Ste. 202		
3	Las Vegas, Nevada 89128		
4	Tel: (702) 816-2200 Email: WBrown@BrownMishler.com		
5	Attorney for Defendant		
6	Pedro Montalvo		
7	UNITED STATES DISTRICT COURT		
8	DISTRICT OF NEVADA		
9	UNITED STATES OF AMERCIA,	2:20-cr-00156-RFB-DJA	
10	Plaintiff,	UNOPPOSED MOTION TO	
11	vs.	ALLOW TRAVEL	
12	ADALI ARNULFO ESCALANTE-		
13	TRUJILLO, et al.,		
14	Defendants.		
15			
16	Certification: This motion is timely filed.		
17			
18	Comes now the defendant, Pedro Montalvo, by and through his counse		
19	of record, William Brown, of BROWN MISHLER, PLLC, and hereby moves		
20 21	this court for permission to travel to California on November 2, 2020, for a		
22	medical appointment. This request is based on the Points and Authorities		
23			
24	attached hereto.		
25	Dated: October 7, 2020	By <u>/s/ William H. Brown</u>	
26		WILLIAM H. BROWN Attorney for Pedro Montalvo	
27		Thurst hey for I ear o Montanto	
28			

MEMORANDUM OF POINTS AND AUTHORITIES

Defendant Pedro Montalvo's pretrial release conditions forbid out-ofstate travel and Montalvo therefore seeks permission from the Court to travel to California for a recently scheduled medical appointment on November 2, 2020.

The defense has communicated with Montalvo's Pretrial Services

Officer, and the government, and neither opposes this request.

Dated: October 7, 2020

By <u>/s/ William H. Brown</u>
WILLIAM H. BROWN
Attorney for Pedro Montalvo

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that he is an employee of BROWN MISHLER, PLLC, and is a person of such age and discretion as to be competent to serve papers, and that on October 7, 2020 he served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO ALLOW TRAVEL** by electronic service (ECF)

/s/ William Brown

Employee of BROWN MISHLER, PLLC

1 2 3 4 5 6	WILLIAM H. BROWN, ESQ. (7623) BROWN MISHLER, PLLC 911 N. Buffalo Dr., Ste. 202 Las Vegas, Nevada 89128 Tel: (702) 816-2200 Email: WBrown@BrownMishler.com Attorney for Defendant Pedro Montalvo	
7 8	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
9	UNITED STATES OF AMERCIA,	2:20-cr- 00156 -RFB-DJA
10 11	Plaintiff, vs.	[PROPOSED] ORDER ALLOWING TRAVEL
12 13	ADALI ARNULFO ESCALANTE- TRUJILLO, et al.,	
14 15	Defendants.	
16		
17	Having considered defendant Pedro Montalvo's unopposed motion for	
18 19	travel, it is hereby ordered that the motion is granted, such that Montalvo	
20	may travel to California for a medical appointment on November 2, 2020.	
21		R
22	Dated: October $\frac{8}{8}$, 2020 $\frac{8}{RI}$	CHARD F. BOULWARE, II
23		ited States District Judge
25		
26		
27		
28		